

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

Benjamin J. Ginter, Esq  
34 Forest Ave  
Cranford, NJ 07016  
T: 908-272-6565  
F: 484-214-0310  
Attorney for Debtor

In Re:  
Virginia E Santos

Case No.: 14-28424

Judge: JKS

Chapter: 13

**APPLICATION FOR RETENTION OF PROFESSIONAL**

1. The applicant, Virginia E. Santos, is the (check all that apply):

☐ Trustee: ☐ Chap. 7 ☐ Chap. 11 ☐ Chap. 13.

☒ Debtor: ☐ Chap. 11 ☐ Chap. 13

☐ Official Committee of \_\_\_\_\_

2. The applicant seeks to retain the following professional Gary Goodman to serve as (check all that apply):

☒ Attorney for: ☐ Trustee ☐ Debtor-in-Possession

☐ Official Committee of \_\_\_\_\_

☐ Accountant for: ☐ Trustee ☐ Debtor-in-possession

☐ Official Committee of \_\_\_\_\_

☐ Other Professional:

☐ Realtor

☐ Appraiser

☐ Special Counsel

☐ Auctioneer

☐ Other (specify): \_\_\_\_\_

3. The employment of the professional is necessary because:

To facilitate the real estate transaction

4. The professional has been selected because:

Gary Goodman is an experienced real estate attorney

5. The professional services to be rendered are as follows:

Preparation of closing documents and any other services needed to close this transaction

6. The proposed arrangement for compensation is as follows:

\$1100 flat fee

7. To the best of the applicant's knowledge, the professional's connection with the debtor, creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee, is as follows:

☒ None

☐ Describe connection: \_\_\_\_\_

8. To the best of the applicant's knowledge, the professional (check all that apply):

☒ does not hold an adverse interest to the estate.

☐ does not represent an adverse interest to the estate.

☐ is a disinterested person under 11 U.S.C. § 101(14).

☐ does not represent or hold any interest adverse to the debtor or the estate with respect to the matter for which he/she will be retained under 11 U.S.C. § 327(e).

☐ Other; explain: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

9. If the professional is an auctioneer, appraiser or realtor, the location and description of the property is as follows: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

The applicant respectfully requests authorization to employ the professional to render services in accordance with this application, with compensation to be paid as an administrative expense in such amounts as the Court may determine and allow.

Date: 10/10/18

/s/ Virginia E. Santos  
Signature of Applicant

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In Re: Virginia E. Santos	Case No.: 14-28424 Judge: JKS Chapter: 13

**CERTIFICATION OF PROFESSIONAL IN SUPPORT OF  
APPLICATION FOR RETENTION OF PROFESSIONAL**

I, Gary Goodman, Esq, being of full age, certify as follows:

- I am seeking authorization to be retained as counsel for sale of real estate
- My professional credentials include: Member New Jersey Bar since 1981
- I am a member of or associated with the firm of GARY S GOODMAN Attorney at Law
- The proposed arrangement for compensation, including hourly rates, if applicable, is as follows: \$1250

☐ Pursuant to D.N.J. LBR 2014-3, I request a waiver of the requirements of D.N.J. LBR 2016-1.

☐ To the best of my knowledge, I am not a creditor, attorney, accountant, or any other person who has a direct or indirect financial interest in the estate of the debtor(s), creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee, as follows.

☒ None

☐ Describe connection: \_\_\_\_\_

6. To the best of my knowledge, after reasonable and diligent investigation, the connection of my firm, its members, shareholders, partners, associates, officers and/or employees with the decedent(s), creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee, is as follows:

☒ None

☐ Describe Connection: \_\_\_\_\_

7. To the best of my knowledge, my firm, its members, shareholders, partners, associates, officers and/or employees and I (check all that apply):

☒ do not have an adverse interest to the estate

☐ do not represent an adverse interest to the estate.

☐ are disinterested under 11 U.S.C. § 101(14).

☒ do not represent or hold any interest adverse to my position or the estate with respect to the matter for which I will be retained under 11 U.S.C. § 327(c).

☐ Other. Explain: \_\_\_\_\_

8. If the professional is an auctioneer,

The following are my qualifications and experience with the liquidation or sale of similar property: \_\_\_\_\_



h. The proposed method of calculation of my compensation, including rates and formulas, is: fixed

Pursuant to D.N.J. 2014-2, I ☒ do or ☐ do not request a waiver of the requirements of D. N. J. LBR 2016-1.

c. The following is an estimate of all costs and expenses, including labor, security, advertising, delivery, mailing, and insurance, for which I will seek reimbursement from the sale proceeds: None

d. Have you, or a principal of your firm, been convicted of a criminal offense?

☒ No ☐ Yes (explain below)

or I certify (under penalty of perjury) that the above information is true and will remain so through the date of turnover of the auction proceeds.

9. If the professional is an auctioneer, appraiser or realtor, the location and description of the property is as follows: \_\_\_\_\_

I certify under penalty of perjury that the above information is true.

Date: 10-10-18

G. S. Goodman  
Signature of Professional

rev. 3/1/15

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In Re:  
Virginia E. Santos

Case No.: 14-28424  
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**ORDER AUTHORIZING RETENTION OF**

Gary Goodman, Esq

The relief set forth on the following page is **ORDERED**.

Upon the applicant's request for authorization to retain Gary Goodman, Esq  
as real estate attorney, it is hereby ORDERED:

1. The applicant is authorized to retain the above party in the professional capacity noted.  
The professional's address is: 23 North Avenue East  
Cranford, NJ 07016
2. Compensation will be paid in such amounts as may be allowed by the Court on proper application(s).
3. If the professional requested a waiver as noted below, it is ☐ Granted ☐ Denied.  
☐ Waiver, under D.N.J. LBR 2014-2(b), of the requirements of D.N.J. LBR 2016-1.  
☐ Waiver, under D.N.J. LBR 2014-3, of the requirements of D.N.J. LBR 2016-1 in a chapter 13 case. Payment to the professional may only be made after satisfactory completion of services.
4. The effective date of retention is the date the application was filed with the Court.